

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN THE MATTER OF:

**SEARCH AND SEIZURE WARRANTS,
APPLICATIONS, PEN REGISTERS, AND
NON-DISCLOSURE ORDERS IN THE
CAPTIONED CASE**

CASE NO. 2:16-mj-00589

MAGISTRATE JUDGE DEAVERS

UNDER SEAL

MOTION TO SEAL

Now comes the United States of America, by and through undersigned counsel, and respectfully requests pursuant to Federal Rule of Criminal Procedure 41(f)(3) and 18 U.S.C. § 3103a(b)(3), that the Search and Seizure Warrants, Applications, Pen Registers, Non-Disclosure Orders, and related documents in this case be sealed until January 31, 2022, or upon a motion by the United States and additional order by the Court to unseal. The undersigned counsel represents that there has been a review of this case and it relates to an extensive, ongoing, and long-term criminal investigation that would be compromised if the existence of these investigations became known. The United States represents that if the documents in were unsealed, pertinent evidence may be destroyed, or additional persons associated with the investigation may attempt to flee the jurisdiction of the court if targets or persons associated become aware of said Search and Seizure Warrants, Applications, Pen Registers, Non-Disclosure Orders, and related documents in the case.

WHEREFORE, the government respectfully requests that the Search and Seizure Warrants, Applications, Pen Registers, Non-Disclosure Orders, and related documents in the case be sealed until January 31, 2022, or upon a motion by the United States and additional order by the Court to unseal, which will ensure that the above-mentioned investigations can continue

without the targets or persons associated with the investigation becoming aware.

Respectfully submitted,

VIPAL J. PATEL
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s/ Jessica W. Knight

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